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and

Russell R. Johnson III
2258 Wheatlands Drive
Manakin-Sabot, Virginia 23103
(804) 749-8861

*Co-Counsel for American Electric Power; Dominion East Ohio;
New York State Electric and Gas Corporation;
Niagara Mohawk Power Corporation; Public Service Electric and
Gas Company; and Rochester Gas & Electric Corporation*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)
In re:) Chapter 11
)
DELPHI CORPORATION, INC., <u>et al.</u>,) Case No. 05-44481 (RDD)
)
Debtors.) (Jointly Administered)
)
)

**VERIFIED STATEMENT PURSUANT TO RULE 2019(a)
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to the provisions of Rule 2019(a) of the Federal Rules of Bankruptcy Procedure,

Russell R. Johnson III files this Verified Statement of his multiple representations in this case:

1. The name and address of the creditors represented by Russell R. Johnson III are:

- A. American Electric Power
Attn: Gina E. Mazzei, Esq.
Legal Department
P.O. Box 1986
Charleston, West Virginia 25327-1986
- B. Dominion East Ohio
Attn: Toni Blaha
P.O. Box 26666
Richmond, Virginia 23261
- C. New York State Electric and Gas Corporation
Attn: Mary C. Haskell
Kirkwood Industrial Park
P.O. Box 5240
Binghamton, New York 13902-5240
- D. Niagara Mohawk Power Corporation
Attn: William C. Grossman, Esq.
Legal Department
144 Kensington Avenue
Buffalo, New York 14214
- E. Public Service Electric and Gas Company
Attn: Sheree Kelly, Esq.
80 Park Plaza T5D
P.O. Box 570
Newark, New Jersey 07102
- F. Rochester Gas & Electric Corporation
Attn: Linda Goldthrite
89 East Avenue
Rochester, New York 14649

2. The nature and the amount of claims (interests) and the times of acquisition thereof are
as follows:

(a) American Electric Power, Dominion East Ohio, New York State Electric and Gas Corporation, Niagara Mohawk Power Corporation, Public Service Electric and Gas Company, and Rochester Gas & Electric Corporation have unsecured claims against one or more of the above-referenced debtors arising from pre-petition utility usage.

3. Russell R. Johnson III was retained to represent the foregoing creditors in October 2005.

RUSSELL R. JOHNSON III

**By: /s/ Russell R. Johnson III
Russell R. Johnson III**

Russell R. Johnson III appeared before me this 24th day of October 2005, and acknowledged that the representations in the foregoing statement are true to the best of his knowledge, information and belief.

NOTARY PUBLIC

/s/ Patricia Farrell-Johnson

My commission expires: December 31, 2006